

1 **LAW OFFICE OF MARTIN STANLEY**  
2 Martin Louis Stanley [State Bar No. 102413]  
3 100 Wilshire Blvd, Suite 700  
4 Santa Monica, CA 90401  
5 Telephone: (310) 399-2555  
Facsimile: (310) 917-1001

6 **BARRETT LAW OFFICE**  
7 Edmont T Barrett [State Bar No. 74117]  
P.O. Box 607  
8 Diamond Springs, CA 95619  
9 Telephone: (530) 642-8468  
Facsimile: (530) 653-2449

10  
11 Attorneys for *Plaintiff*, MARCO MILLA

12 **UNITED STATES DISTRICT COURT**

13  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 MARCO MILLA an individual,

16 Plaintiff,

17 vs.

18  
19 CITY OF LOS ANGELES a  
municipal entity; LOS ANGELES  
20 POLICE DEPARTMENT, a municipal  
entity; COUNTY OF LOS ANGELES,  
21 DETECTIVE R. ULLEY AND  
22 DETECTIVE J. VANDER HORCK,  
23 and DOES 1 through 100, inclusive,

24 Defendants.

25 Case No. CV-00134-FWS-MRW  
Hon. Judge Fred W. Slaughter  
Hon. Magistrate Judge Michael R.  
Wilner

26 DECLARATION OF MARTIN  
STANLEY RE REPORT ON OTHER  
CASES

**Trial**

Date: 07/05/2023  
Time: 08:30 AM  
Courtroom: 10D, Santa Ana

**Pre-Trial Conference**

Date: 06/16/2023  
Time: 09:00 AM  
Courtroom: 10D, Santa Ana

1 I, MARTIN STANLEY, declare:

2 1. I am one of the attorneys for plaintiff and am admitted to practice before this  
3 and other Courts. I have personal and firsthand knowledge of the facts herein  
4 and, if called as a witness, could and would competently testify thereto.

5 2. Prior to this Court's response to the declaration I previously submitted and  
6 immediately after the Marks court set the trial date, I met and conferred with  
7 defense counsel in Marks and we were able to agree on a stipulation to  
8 continue Marks with defense counsel agreeing to extend the 5 ½ year statute  
9 an additional month.

10 3. The Marks court did not rule on the stipulation as of this past Friday. Hence I  
11 prepared an ex parte application to continue Marks which included both the  
12 stipulation and this Court's response to my last declaration. That worked.  
13 When we appeared today for trial the Marks court granted our ex parte and  
14 continued the Marks trial to September 26, 2023.

15 4. **Issues requested to be discussed at upcoming pre-trial conference.** I have  
16 met and conferred further with defense counsel on the issues of qualified  
17 immunity and the presumption of prosecutorial independence and have filed a  
18 brief with this Court previously. If counsel are unable to resolve these issues,  
19 Plaintiff respectfully requests that the Court discuss these issues with counsel  
20 at the pretrial this coming Friday.

1 I declare under penalty of perjury that the foregoing is true and correct.  
2  
3 Executed this 7<sup>th</sup> day of June, 2023, at Santa Monica, California.  
4

By: /s/ Martin Stanley

MARTIN STANLEY, ESQ.  
Attorneys for Plaintiff,  
MARCO MILLA

1                   **PROOF OF SERVICE**

2                   **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3  
4                   I am employed in the County of Los Angeles, State of California. I am  
5 over the age of 18 and not a party to the within action; my business address is 100  
5 Wilshire Blvd, Suite 700, Santa Monica, California 90401.

6  
7                   On June 7, 2023, I served the foregoing document(s) on the  
interested parties in this action by email as follows:

9  
10                  **Attorney for Defendants:**

11                  KEVIN GILBERT

12                  Email: [kgilbert@ohhlegal.com](mailto:kgilbert@ohhlegal.com)

13                  BY ELECTRONIC DELIVERY DUE TO COVID-19

14  
15                  [X] STATE: I declare under penalty of perjury under the laws of the State  
of California that the above is true and correct.

16  
17                  Executed on **June 7, 2023**, at Santa Monica, California

18  
19                  \_\_\_\_\_  
20                  /s/ MARTIN STANLEY

21  
22                  Martin Stanley